



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 30, 2016

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Union River Telephone Company
Study Area Code 100027**

Dear Ms. Dortch:

On behalf of Union River Telephone Company ("Union River"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the Company's Five-Year Service Quality Improvement Plan Progress Report required by Section 54.313.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313.



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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2016 ETC Annual Report of Union River Telephone Company
Study Area Code 100027
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Union River Telephone Company (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313, Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2016 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Progress Report provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313.

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality

Page 3

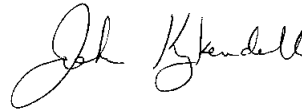
the attachment under seal. The Company uses the information contained in the Progress Report to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Progress Report provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name: Person USAC should contact with questions about this data	David Pelletier
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dpelletier@rivah.net
	Form Type	54.313 and 54.422

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

100027ME112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Not Applicable
Yes
Yes
Yes
Yes
Yes

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**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
100027ME510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	

(600) Functionality in Emergency Situations Data Collection Form		REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	100027ME610.pdf

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 100027

<015>	Study Area Name	UNION RIVER TEL CO
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<020>	Program Year	2017
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> dpelletier@rivah.net

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

1/1/2016

[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<900>	Does the filing entity offer tribal land services? (Y/N)	No
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If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 100027ME1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 100027ME1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP www.rivah.net/Basic%20Service%20Summary.pdf

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental Support
- <2011> 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support
- <2022> Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 1 or Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

(2000) Price Cap Carrier Additional Documentation (Continued)

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017B> Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price

Name of Attached Document Listing
Required Information

cap carrier used for capital expenditures in 2015.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)

<2020> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)

<2021> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)

<2026> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)

<2027> Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)

<010>	Study Area Code	100027
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}	Yes - Attach Certification	
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	100027ME3010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	100027ME3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	100027
<015> Study Area Name	UNION RIVER TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	David Pelletier
<035> Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: UNION RIVER TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2016
Printed name of Authorized Officer: William Silsby jr	
Title or position of Authorized Officer: President/General Manager	
Telephone number of Authorized Officer: 2075849911 ext.	
Study Area Code of Reporting Carrier: 100027	Filing Due Date for this form: 07/01/2016
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	100027
<015> Study Area Name	UNION RIVER TEL CO
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	David Pelletier
<035> Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<701> Residential Local Service Charge Effective Date

1/1/2016

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	100027
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<015>	Study Area Name	UNION RIVER TEL CO
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<020>	Program Year	2017
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
-------	---	-----------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
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<711>	<a1>	<a2>	<b1>	<b2>	<c>	<d1>	<d2>	<d3>	<d4>
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[illegible]

REDACTED FOR PUBLIC INSPECTION

(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<810>	Reporting Carrier	Union River Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Union River Telephone Company

[illegible]

Section 1: Certification of Officer

Section 54.313(a)(5) and Section 54.422(b)(3), of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding its Service Quality Standards and Consumer Protection Rules Compliance.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company meets the Service Quality Standards and Consumer Protection Rules of the Maine Public Utilities Commission and that the statements made herein are accurate:

Name of Officer (Print): William S. Silsby, Jr.

Title: President/General Manager

Signature: 

Date: June 29, 2016

ETC Annual Reporting Requirements 47 CFR §54.313(a)(5) and 47 CFR §54.422(b)(3) –
Description of Compliance with Service Quality Standards and Consumer Protection Rules
Compliance (Data Line 510)

**Section 2: Description of Service Quality Standards and Consumer Protection Rules
Compliance**

Under Maine Revised Statute Title 35-A, Chapter 72: Telecommunications Regulatory Reform, a framework has been put in place that is designed to reflect the goals of 47 CFR § 54.313(a)(5) and 47 CFR § 54.422(b)(3). As a result of that framework that has been put in place, the Maine Public Utilities Commission operating under the Code of Maine Rules 65-407, Chapter 201 which became effective July 27, 2014, established a set of metrics and benchmarks that we as a Provider of Last Resort are expected to meet and that are reported on quarterly. Failure to meet the benchmarks, subject carriers to the potential for financial sanctions pending an investigation by the Commission. Prior to the provisional adoption of Chapter 201, ETCs in Maine had been reporting on these same metrics for a number of years.

The Maine Public Utilities Commission through the Code of Maine Rules 65-407, Chapter 290 has in place a consumer protection structure to regulate ETCs offering Provider of Last Resort service. These Standards for Billing, Credit and Collection, and Customer Information are designed to provide consumers adequate and timely information, prevent discrimination, ensure reasonable access to service and establish a set of consumer protection standards. For any disputes that may arise, the Consumer Assistance Division of the Maine Public Utilities Commission is available to assist consumers and ETCs with the resolution process. The consumer protection rules require the preparation of an annual report summarizing various measurable items included in the Chapter.

ETC Annual Reporting Requirements 47 CFR §54.313(a)(6) and 47 CFR §54.422(b)(4) and set forth in 47 CFR §54.202(a)(2)-Functionality in Emergency Situations (Data Line 610)

Section 1: Certification of Officer

Section 54.313(a)(6) and Section 54.422(b)(4), as set forth in Section 54.202(a)(2) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding its ability to function in emergency situations.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company is able to remain functional in emergency situations and that the statements made in this herein are accurate:

Name of Officer (Print): William S. Silsby, Jr.

Title: President/General Manager

Signature: 

Date: June 29, 2016

Section 2: Description of Functionality in Emergency Situations

The Company has equipped each of its Central Office locations, its Headquarters building, and remote equipment sites with fixed standby generators. The Company also owns portable generators to provide backup to fixed units at remote equipment sites.

The Company has a fiber optic ring serving equipment that provides service to approximately 86% of its customers. Due to the geography of the area, the remaining 14% of customers cannot be served by a diverse route. The Company also has diverse routing to the Point of Connection, however, the connecting company does not provide a diverse route from the Point of Connection to their connecting office. The Company has contacted the connecting company with a proposal to provide a diverse route from the point of connection to the connecting office.

The Company can monitor traffic and has the ability to manage such traffic up to the limits imposed by the quantity of facilities in service at the time of an emergency.

Section 1: Certification of Officer

Section 54.313(a)(10) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding Voice Services Rate Comparability.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company's pricing of voice services is no more than two standard deviations above the applicable national average urban rate for voice service and that the statements made herein are accurate:

Name of Officer (Print): William S. Silsby, Jr.

Title: President/General Manager

Signature: 

Date: June 29, 2016

Section 2: Description of Voice Service Rate Comparability

The Company offers the following description as to how the pricing of its voice services is no more than two deviations above the applicable national average urban rate for voice service. As per Public Notice DA 16-362, the Wireline Competition Bureau announced the results of the 2016 Urban Rate Survey for fixed voice services is to be \$21.93, thus a carrier receiving High Cost Program support must certify that its local rate and state fees is below \$41.07.

Consistent with Data Line 700, Company Voice Telephony Service Price Offerings, completed in accordance with 47 CFR § 54.313(a)(7), the Company offers two flat rate options in each of its exchanges based on local calling area. The flat rated Residential Local Service Rate plus state fees yields exchange charges per line of \$17.93 and \$19.46, which are well below \$41.07.

Section 1: Certification of Officer

Section 54.313(a)(12) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding Broadband Services Rate Comparability.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company's pricing of broadband services falls within the applicable national average urban benchmark rate for broadband service and that the statements made herein are accurate:

Name of Officer (Print): William S. Silsby, Jr.

Title: President/General Manager

Signature:

William S. Silsby Jr.

Date: June 29, 2016

Section 2: Description of Broadband Service Rate Comparability

The Company offers the following description as to how the pricing of its broadband services is at or below the relevant reasonable comparability benchmark service. As per Public Notice DA 16-362, the Wireline Competition Bureau announced the results of the 2016 Urban Rate Survey for fixed voice and broadband services. Based on the criteria with a download speed of 10Mbps and an upload speed of 1 Mbps with an unlimited usage allowance, thus a carrier receiving High Cost Program support must certify that its broadband service is at or below \$75.20.

Consistent with Data Line 710, Company Broadband Price Offerings, completed in accordance with 47 CFR § 54.313(a)(7), the Company offers a plan with a download speed of 10Mbps and an upload speed of 1 Mbps with an unlimited usage allowance at a monthly rate of \$59.95. Based on this plan offering, the Company falls well below the benchmark of \$75.20.

Union River Telephone Company (SAC 100027)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Union River Telephone Company hereby certifies that throughout 2015, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY